

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JANE DOE 1, and JANE DOE 2,

Plaintiffs,

Case No. 2:25-cv-10806

vs.

Hon. Mark A. Goldsmith

MATTHEW WEISS; the REGENTS OF
THE UNIVERSITY OF MICHIGAN;
the UNIVERSITY OF MICHIGAN;
KEFFER DEVELOPMENT
SERVICES, LLC,

Defendants.

Electronically Filed and Served

**DEFENDANT KEFFER
DEVELOPMENT SERVICES,
LLC'S JOINDER IN DEFENDANT
REGENTS OF THE UNIVERSITY
OF MICHIGAN AND DEFENDANT
THE UNIVERSITY OF
MICHIGAN'S RESPONSE IN
OPPOSITION TO PLAINTIFFS'
MOTION FOR AFFIRMATIVE
INJUNCTIVE RELIEF**

Filed on behalf of Defendant:
Keffer Development Services, LLC

Thomas W. King, III
PA ID # 21580
**DILLON, McCANDLESS, KING,
COULTER & GRAHAM L.L.P.**
128 West Cunningham Street
Butler, PA 16001
Telephone: 724-283-2200
Facsimile: 724-283-2298

tking@dmkcg.com

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MATTHEW WEISS; the REGENTS
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DEVELOPMENT SERVICES, LLC,

Defendants.

**DEFENDANT KEFFER DEVELOPMENT SERVICES, LLC’S JOINDER IN
DEFENDANT REGENTS OF THE UNIVERSITY OF MICHIGAN AND
DEFENDANT THE UNIVERSITY OF MICHIGAN’S RESPONSE IN
OPPOSITION TO PLAINTIFFS’ MOTION FOR AFFIRMATIVE
INJUNCTIVE RELIEF**

Defendant, Keffer Development Services LLC, (“Keffer”) by and through its undersigned counsel, hereby files its Joinder in Defendant, Regents of the University of Michigan, and Defendant, the University of Michigan’s (hereinafter the “University Defendants”), Response in Opposition to Plaintiffs’ Motion for Affirmative Injunctive Relief stating further as follows:

1. On May 6, 2025, the University Defendants filed their “Response in Opposition to Plaintiffs’ Motion for Affirmative Injunctive Relief” (hereinafter the “Response”). *See* ECF 46.

2. Federal Rule of Civil Procedure 10(c) provides, in pertinent part, “Adoption by Reference...A statement in a pleading may be adopted by reference elsewhere in the same pleading or in *any other pleading or motion.*” USCS Fed Rules Civ Proc R 10. (emphasis added).

3. Pursuant to FRCP 10, Keffer joins the University Defendants’ Response filed at ECF 46 expressly incorporating the argument set forth related to Plaintiffs being unable to “meet their burden of demonstrating the elements necessary for an injunction,” and respectfully requests that this Court deny Plaintiffs’ Motion for Affirmative Injunctive Relief.

WHEREFORE, Keffer respectfully requests that the Court adopt the argument as set forth in the University Defendants’ Response and deny Plaintiffs’ Motion for Affirmative Injunctive Relief.

[SIGNATURE APPEARS ON THE FOLLOWING PAGE]

Respectfully Submitted,

**DILLON McCANDLESS KING
COULTER & GRAHAM, LLP**

Dated: May 6, 2025

By: /s/ Thomas W. King, III
Thomas W. King, III
PA. I.D. No. 21580

128 West Cunningham St.
Butler, PA 16001
Telephone: 724-283-2200
Fax: 724-283-2298
Email: tking@dmkcg.com

*Counsel for Defendant, Keffer
Development Services, LLC*